

July 21, 2003

Mr. Tyrone Evans  
United States Postal Service Eagle Air Hub  
2475 South Hofman Road  
Indianapolis, Indiana 46241

Re: Exempt Construction and Operation Status, 097-17408-00503

Dear Mr. Evans:

The application from United States Postal Service Eagle Air Hub, received on June 16, 2003, has been reviewed. Based on the data submitted and the provisions in 326 IAC 2-1.1-3, it has been determined that the following emergency diesel generator, to be located at 2475 South Hofman Road, Indianapolis, Indiana 46241, is classified as exempt from air pollution permit requirements:

- (a) One (1) emergency diesel generator, identified as 001, installed in 2003, with a maximum heat input rate of 5.715 million Btu per hour (MMBtu/hr), using no emission control.

The following conditions shall be applicable:

- (a) Pursuant to 326 IAC 5-1-2 (Opacity Limitations) except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following:
  - (1) Opacity shall not exceed an average of thirty percent (30%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
  - (2) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of 15 minutes (60 readings) in a 6-hour period as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor in a six (6) hour period.

This exemption is the first air approval issued to this source.

An application or notification shall be submitted in accordance with 326 IAC 2 to the Office of Environmental Services (OES) and IDEM, Office of Air Quality (OAQ) if the source proposes to construct new emission units, modify existing emission units, or otherwise modify the source. If you have any questions, please feel free to contact Angelique Oligier at 327-2846 or [aoliger@indygov.org](mailto:aoliger@indygov.org).

Sincerely,

Original Signed by John B. Chavez  
John B. Chavez, Administrator

aco

cc: File  
Air Compliance, Matt Mosier  
IDEM, Mindy Hahn  
Permits, Angelique Oligier

United States Postal Service Eagle Air Hub  
Indianapolis, Indiana  
Permit Reviewer: Angelique Oliger

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**Indiana Department of Environmental Management  
Office of Air Quality  
and  
City of Indianapolis  
Office of Environmental Services**

**Technical Support Document (TSD) for an Exemption**

**Source Background and Description**

**Source Name:** United States Postal Service Eagle Air Hub  
**Source Location:** 2475 Hofman Road, Indianapolis, Indiana 46241  
**County:** Marion  
**SIC Code:** 4311  
**Operation Permit No.:** 097-17408-00503  
**Permit Reviewer:** Angelique Oliger

The Office of Environmental Services (OES) has reviewed an application from United States Postal Service Eagle Air Hub relating to the construction and operation of an emergency diesel generator.

**Permitted Emission Units and Pollution Control Equipment**

The source consists of the following permitted emission units and pollution control devices:

- (a) One (1) emergency diesel generator, identified as 001, installed in 2003, with a maximum heat input rate of 5.715 million Btu per hour (MMBtu/hr), using no emission control.

**Unpermitted Emission Units and Pollution Control Equipment**

There are no unpermitted facilities operating at this source during this review process.

**Enforcement Issue**

There are no enforcement actions pending.

**Recommendation**

The staff recommends to the Administrator that the construction and operation be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

A complete application for the purposes of this review was received on June 16, 2003.

**Emission Calculations**

See Appendix A (two pages) of this document for detailed emissions calculations.

### Potential To Emit

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source or emissions unit to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA, the department, or the appropriate local air pollution control agency.”

| Pollutant       | Potential To Emit (tons/year) |
|-----------------|-------------------------------|
| PM              | 0.36                          |
| PM-10           | 0.36                          |
| SO <sub>2</sub> | negligible                    |
| VOC             | 0.06                          |
| CO              | 0.89                          |
| NO <sub>x</sub> | 3.58                          |
| HAPs            | negligible                    |

- (a) Fugitive Emissions  
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

### Actual Emissions

No previous emission data has been received from the source.

### County Attainment Status

The source is located in Marion County.

| Pollutant       | Status                 |
|-----------------|------------------------|
| PM-10           | attainment             |
| SO <sub>2</sub> | maintenance attainment |
| NO <sub>2</sub> | attainment             |
| Ozone           | maintenance attainment |
| CO              | attainment             |
| Lead            | unclassifiable         |

- (a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Marion County has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (b) Marion County has been classified as attainment or unclassifiable for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

- (c) Fugitive Emissions  
Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2, or 326 IAC 2-3 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

### Source Status

New Source PSD Definition (emissions after controls, based on 8,760 hours of operation per year at rated capacity and/ or as otherwise limited):

| Pollutant       | Emissions (ton/yr) |
|-----------------|--------------------|
| PM              | 0.36               |
| PM10            | 0.36               |
| SO <sub>2</sub> | negligible         |
| VOC             | 0.06               |
| CO              | 0.89               |
| NO <sub>x</sub> | 3.58               |
| Single HAP      | negligible         |
| Combination     | negligible         |

- (a) This new source is not a major stationary source because no attainment pollutant is emitted at a rate of 250 tons per year or greater and it is not in one of the 28 listed source categories. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

### Part 70 Permit Determination

#### 326 IAC 2-7 (Part 70 Permit Program)

This new source is not subject to the Part 70 Permit requirements because the potential to emit (PTE) of:

- (a) each criteria pollutant is less than 100 tons per year,  
(b) a single hazardous air pollutant (HAP) is less than 10 tons per year, and  
(c) any combination of HAPs is less than 25 tons/year.

This is the first air approval issued to this source.

### Federal Rule Applicability

- (a) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this source.  
(b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR Part 63) applicable to this source.

### State Rule Applicability - Entire Source

#### 326 IAC 1-6-3 (Preventive Maintenance Plan)

Only sources required to obtain a permit are required to prepare and maintain a Preventive Maintenance Plan (PMP). The potential to emit regulated air pollutants appears to be below any minimum permitting threshold or permitting provisions found in 326 IAC 2-1.1-2 (Permit Review

Rules: General Provisions; Applicability) and or 326 IAC 2-5.1 (Construction of New Sources). Therefore, this source is not subject to 326 IAC 1-6-3.

326 IAC 2-4.1(HAPs Major Sources; New Source Toxics Control)

The source has the potential to emit of less than ten (10) tons per year of single HAP and less than twenty-five (25) tons per year of any combination of HAPs. Therefore, 326 IAC 2-4.1 does not apply.

326 IAC 2-6 (Emission Reporting)

This source is not subject to 326 IAC 2-6 (Emission Reporting), because it has the potential to emit less than ten (10) tons per year of NO<sub>x</sub> and/or VOC in Marion County and less than one hundred (100) tons per year of Particulate Matter (PM). In addition, the potential to emit HAPs is less than any major source threshold and, as such, is not required to obtain a permit under 326 IAC 2-7 (Part 70 Permit Program). As a result, 326 IAC 2-6 (Emission Reporting) does not apply.

326 IAC 5-1 (Opacity Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of thirty percent (30%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor in a six (6) hour period.

326 IAC 6 (Particulate Rules)

- (a) This source does not have the potential to emit Particulate Matter (PM) in excess of one hundred (100) tons per year or have actual PM emissions of greater than ten (10) tons per year. Therefore, 326 IAC 6-1 does not apply to this source.
- (b) This rule establishes emission limitations for particulate emissions from process operations located anywhere in the state. This source does not have particulate emissions. Therefore, 326 IAC 6-3 does not apply to this source

326 IAC 8 (Volatile Organic Compound Rules)

- (a) This source does not have the potential to emit Volatile Organic Compounds in excess of 25 tons per year therefore, 326 IAC 8-1-6 does not apply.
- (b) There are no other 326 IAC 8 rules applicable to this source.

**Conclusion**

The construction and operation of this emergency diesel generator for United States Postal Service Eagle Air Hub located at 2475 Hofman Road, Indianapolis, Indiana 46241 shall be exempt from air pollution control permit requirements by exemption 097-17408-00503.

**Appendix A: Emissions Calculations**  
**Commercial/Institutional/Residential Combustors (< 100 mmBtu/hr)**  
**#1 and #2 Fuel Oil**

**Company Name: United States Postal Service Eagle Air Hub**  
**Address, City IN Zip: 2475 Hofman Road, Indianapolis, Indiana 46241**  
**CP: 097-17408-00503**  
**Reviewer: Angelique Oliger**  
**Date: June 18, 2003**

Heat Input Capacity                      Potential Throughput                      S = Weight % Sulfur  
MMBtu/hr                                      kgals/year                                     

                                     357.5957143

| Emission Factor in lb/kgal    | Pollutant |               |      |      |      |
|-------------------------------|-----------|---------------|------|------|------|
|                               | PM*       | SO2           | NOx  | VOC  | CO   |
|                               | 2.0       | 0<br>(142.0S) | 20.0 | 0.34 | 5.0  |
| Potential Emission in tons/yr | 0.36      | 0.00          | 3.58 | 0.06 | 0.89 |

**Methodology**

1 gallon of No. 2 Fuel Oil has a heating value of 140,000 Btu

Potential Throughput (kgals/year) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1kgal per 1000 gallon x 1 gal per 0.140 MM Btu

Emission Factors are from AP 42, Tables 1.3-1, 1.3-2, and 1.3-3 (SCC 1-03-005-01/02/03) Supplement E 9/98 (see erata file)

\*PM emission factor is filterable PM only. Condensable PM emission factor is 1.3 lb/kgal.

Emission (tons/yr) = Throughput (kgals/ yr) x Emission Factor (lb/kgal)/2,000 lb/ton

Note: Check the applicable rules and test methods for PM and PM10 when using the above emission factors to confirm that the correct factor is used (i.e., condensable included/not included).

See page 2 for HAPs emission calculations.

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**Appendix A: Emissions Calculations**  
**Commercial/Institutional/Residential Combustors (< 100 mmBtu/hr)**  
**#1 and #2 Fuel Oil**  
**HAPs Emissions**

**Company Name: United States Postal Service Eagle Air Hub**  
**Address, City IN Zip: 2475 Hofman Road, Indianapolis, Indiana 46241**  
**CP: 097-17408-00503**  
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HAPs - Metals

| Emission Factor in lb/mmBtu   | Arsenic<br>4.0E-06 | Beryllium<br>3.0E-06 | Cadmium<br>3.0E-06 | Chromium<br>3.0E-06 | Lead<br>9.0E-06 |
|-------------------------------|--------------------|----------------------|--------------------|---------------------|-----------------|
| Potential Emission in tons/yr | 1.00E-04           | 7.51E-05             | 7.51E-05           | 7.51E-05            | 2.25E-04        |

HAPs - Metals (continued)

| Emission Factor in lb/mmBtu   | Mercury<br>3.0E-06 | Manganese<br>6.0E-06 | Nickel<br>3.0E-06 | Selenium<br>1.5E-05 |
|-------------------------------|--------------------|----------------------|-------------------|---------------------|
| Potential Emission in tons/yr | 7.51E-05           | 1.50E-04             | 7.51E-05          | 3.75E-04            |

Methodology

No data was available in AP-42 for organic HAPs.

Potential Emissions (tons/year) = Throughput (mmBtu/hr)\*Emission Factor (lb/mmBtu)\*8,760 hrs/yr / 2,000 lb/ton